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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

North American Numbering Council
Recommendation Concerning Local
Number Portability Administration
Wireline and Wireless Integration

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CC Docket No. 95-116
NSD File No. L-98-94

COMMENTS

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SUMMARY

The NANC Report does not comply with the substantive requirements set forth in the Commission's *Second Report and Order*. The Commission directed the NANC to develop specifications and procedures necessary for CMRS provider participation in wireless number portability. The NANC Report does not provide the specifications and procedures requested by the Commission. In the absence of such specifications and procedures, wireless carriers cannot meet the current June 30, 1999 WNP implementation deadline. The Commission should act promptly to grant CTIA's petition for a deferral of the current June 30, 1999 deadline.

The NANC Report fails to accomplish the four tasks given to NANC by the Commission. Instead the NANC identified other legitimate technical issues that need to be resolved prior to WNP implementation and set those issues for future resolution. The Commission should direct NANC to reset its priorities by addressing the roaming issues before addressing less crucial issues.

The NANC Report is procedurally flawed. The Report claims to represent all parties and segments of the telecommunications industry. However, the NANC modified the report it received from the Wireless and Wireline Integration Task Force (WWITF) and submitted the revised report to the Commission without advising the Commission of the modifications. Because the participation in the working groups is broader than NANC member companies the NANC should not unilaterally modify the work product of working groups to which it has delegated specific tasks. If NANC disagrees with elements of working group reports, it should submit the report to the Commission in its original form, and separately explain its reasons for making a different recommendation to the Commission.

For the reasons set forth above, the Commission should waive current wireless portability implementation deadlines, reject the NANC's May 18 recommendation and require the NANC to redirect its efforts to resolving the technical issues that are a prerequisite to beginning WNP implementation.

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COMMENTS OF BELLSOUTH

BellSouth Corporation,¹ on behalf of itself and its affiliated companies (BellSouth), by counsel, hereby comments on the North American Numbering Council Recommendation Concerning Local Number Portability Administration Wireline and Wireless Integration (NANC Report), pursuant to the Public Notice released in this docket on June 29, 1998.² The NANC Report is procedurally and substantively flawed, and highlights the urgent need for the Commission to waive current wireless number portability implementation deadlines.

I. THE NANC REPORT DOES NOT PROVIDE THE TECHNICAL SPECIFICATIONS WITHOUT WHICH WIRELESS CARRIERS CANNOT BEGIN TO IMPLEMENT NUMBER PORTABILITY

A long-term database method for wireline number portability (LNP) is scheduled to be implemented by local exchange carriers serving the 100 largest metropolitan statistical areas

¹ BellSouth Corporation (BSC) is a publicly traded Georgia corporation that holds the stock of companies which offer local telephone service, provide advertising and publishing services, market and maintain stand-alone and fully integrated communications systems, and provide mobile communications and other network services world-wide.

² *Common Carrier Bureau Seeks Comment on North American Numbering Council Recommendation Concerning Local Number Portability Administration Wireline and Wireless Integration*, (CC Docket 95-116), NSD File No. L-98-84, Public Notice, DA 98-1290 (released June 29, 1998) (*Public Notice*).

(MSAs) by the end of this year. LNP is being implemented by wireline carriers pursuant to congressional mandate and to recommendations made by the North American Numbering Council (NANC) Local Number Portability Administration (LNPA) Working Group in a report that was adopted by the FCC well before commencement of the Commission's wireline LNP implementation schedule on October 1, 1997.

By contrast, certain commercial mobile radio service (CMRS) providers are also currently obligated under the Commission's rules to provide a long-term database method of wireless number portability (WNP) by June 30, 1999. That date is prior to, or at best concurrent with, the development of specific NANC recommendations relating to wireless issues. When the Commission adopted the NANC wireline LNP recommendations, the Commission directed the NANC to develop specifications and procedures in order to support WNP:

CMRS providers will need *clear guidelines* as to how to query the Service Management databases to determine proper call routing, *as well as how to implement wireless number portability*. The NANC must also consider other issues of concern to wireless providers, such as how to account for differences between service area boundaries for wireline versus wireless services and how to implement number portability in a roaming environment. In revising local number portability standards to incorporate the concerns of the wireless industry, the NANC should remain cognizant of the goals of ensuring the interoperability of networks and nondiscrimination as applied to CMRS providers.³

NANC was further directed by the Commission to monitor the efforts of CTIA and other wireless industry groups in making its recommendations, to deliver these recommendations

³ See Telephone Number Portability, *Second Report and Order*, CC Docket No. 95-116, 12 FCC Rcd 12281, 12333-12334 (rel. Aug. 18, 1997) (*Second Report and Order*). (emphasis added).

within nine months of the effective date of the *Second Report and Order*, and to follow new procedural requirements developed by the Commission for acting on NANC recommendations.⁴

NANC in turn delegated its responsibilities to the Wireless and Wireline Integration Task Force (WWITF) of the LNPA Working Group. NANC directed the WWITF to:

- (1) Specify any modifications to the NANC Functional Requirements Specifications (FRS), which define the requirements for the Number Portability Administration Center Service Management System database (NPAC SMS or NPAC), required to support WNP;
- (2) Specify any modifications to the NANC Interoperability Specifications (IIS), which define the requirements for carriers' mechanized interfaces with the NPAC SMS, in order to support WNP;
- (3) Monitor industry efforts to develop technical solutions for implementing WNP; and,
- (4) Develop the WNP recommendation to the FCC by May 18, 1998.⁵

The WWITF delivered its report on May 8, 1998. NANC adopted the report and forwarded it to the Common Carrier Bureau (Bureau) "as [NANC's] recommendation in accordance with the directive of the Federal Communications Commission in its *Second Report and Order* in CC Docket No. 95-116."⁶

Despite the claim of compliance with the *Second Report and Order*,⁷ and although it has characterized the NANC Report as "its recommendation in accordance with the directive of [the

⁴ *Id.* The NANC recommendation was therefore due on May 18, 1998.

⁵ North American Numbering Council, Local Number Portability Administration Working Group Report on Wireless Wireline Integration (May 8, 1998) (NANC Report) at 6, §§ 2.3.1-4.

⁶ Letter from Alan C. Hasselwander, Chairman, North American Numbering Council, to A. Richard Metzger, Jr., Chief, Common Carrier Bureau, FCC (May 18, 1998) (NANC Letter) at ¶ 2.

⁷ *Id.*

Commission] in its *Second Report and Order*,⁸ the NANC Report does not provide technical specifications and procedures necessary for CMRS providers to implement WNP. Indeed, the *Public Notice* acknowledges that the NANC Report has not resolved important issues that are necessary for WNP implementation. Thus, BellSouth doubts that a “final” NANC recommendation can be expected in time for the industry to meet the WNP deadline.⁹ Without additional direction from the Commission it is unreasonable to expect that NANC will redirect its efforts as recommended herein.

As a result, and unlike the experience of wireline carriers set forth above, wireless carriers are in the untenable position of having to implement WNP pursuant to a Commission mandate prior to, or, at best, concurrent with, the development of the technical standards which the Commission had directed the NANC to make available by May 18, 1998.¹⁰ This is completely inconsistent with the Commission’s directive that NANC both provide “clear guidelines” as to “how to implement wireless number portability” and remain “cognizant of the goals of ensuring the interoperability of networks, and nondiscrimination as applied to CMRS providers.”¹¹ Although a starting point, the NANC Report simply does not provide the specifications and procedures necessary to permit CMRS provider implementation of number portability to begin. Even if an adequate recommendation is released by the end of 1998, it is unreasonable to expect

⁸ *Id.*

⁹ *Id.*

¹⁰ The Telecommunications Act of 1996 did not impose a number portability requirement on CMRS providers. Rather, the Commission determined that it had independent statutory authority to impose under the provisions of the Communications Act of 1934. *Telephone Number Portability*, First Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 95-116, 11 FCC Rcd 8352, 8431 (1996), *appeal pending sub nom.* Bell Atlantic NYNEX v. FCC, No. 97-9551 (10th Cir. filed July 30, 1997).

¹¹ *Second Report and Order* at 12333-12334.

the industry to implement WNP by the current deadline. The June 30, 1999 WNP implementation deadline is clearly untenable.

WNP implementation cannot even begin until (1) adequate recommendations are provided by NANC or other industry fora; (2) operational and procedural guidelines are developed by industry consensus; (3) industry standards are established; (4) service providers contact vendors, assess implementation impacts, and develop work plans; (5) all regional number portability limited liability companies (LLCs), which provide LNPA oversight, provide preliminary approval for the work; (6) the LNPA for all NPAC regions determines the scope of work and provides time and cost estimates; and (7) all LLCs formally approve work efforts.

The NANC report accomplishes none of the four tasks given the WWITF by the NANC in response to the Commission's directive. In addition, the NANC report identifies fundamental technical issues that must be resolved prior to beginning WNP implementation. These technical issues are:

- The Disparity of Porting Between Wireless & Wireline Carriers
- Industry Development of Consensus Technical Specifications For MIN/MDN Separation
- Evaluation of the Impacts of Wireless Number Portability on Resellers
- Evaluation Of the Intervals Associated with the LSR Process

Until these issues are resolved WNP cannot be properly implemented. The deferral of these issues demonstrates an astonishing failure to grasp the proper priorities that must be addressed before WNP implementation can begin. The Commission must therefore direct NANC to resolve, within a reasonable timeframe, the remaining technical issues which are discussed below:

A. The Commission Must Encourage Industry Development of Consensus Technical Standards For MIN/MDN Separation.

Given the Commission's mandate to implement WNP by June 30, 1999 without jeopardizing customers' ability to roam between wireless carriers, a primary objective of NANC should have been to develop the technical specifications to solve the roaming problem. Instead, NANC offered a brief attachment to the NANC Letter entitled "Support of Nation Wide Roaming," which, although accurate, does nothing more than to recommend that *the Commission clarify and more fully communicate the intended impact on those CMRS providers involved in nationwide roaming but not involved in number portability*.¹² LNP has significant impact on nationwide roaming. The record in the number portability proceeding had already established that current roaming technologies are incompatible with LNP. That incompatibility prompted the Cellular Telecommunications Industry Association (CTIA) to file its separate pending petitions for waiver of, and for forbearance from, the current implementation deadlines for wireless number portability.¹³ The July 7, 1998 CTIA Report on Wireless Number Portability (CTIA Report) discusses the impacts of the current proposed wireless number portability (WNP) architecture on nationwide roaming in detail. The CTIA Report concludes that due to the Commission's mandate to support nationwide roaming and the need to separate the Mobile Identification Number (MIN) and Mobile Directory Number (MDN), wireless providers involved

¹² Attachment to NANC Transmittal Letter Related to the NANC Local Number Portability Administration Working Group Report on Wireless Wireline Integration (undated) at 2 (emphasis added). BellSouth agrees with NANC that the Commission should provide this clarification as quickly as possible, but, in the meantime, there is nothing to stop NANC from examining all aspects of the roaming problem and positing alternative solutions.

¹³ *Telephone Number Portability*, CC Docket 95-116, CTIA Petition for Extension of Implementation Deadlines (filed Nov. 24, 1997); CTIA Petition for Forbearance (filed Dec. 16, ...Continued

in roaming outside the top 100 MSAs must still enhance their network to serve subscribers with MINs that are not equal to MDNs.¹⁴ Similarly, the NANC Report also addresses roaming. The NANC Report concludes that nationwide roaming cannot be supported unless MIN/MDN separation is implemented by all MIN based wireless systems (not just those in the 100 MSAs) prior to the start of WNP.¹⁵

As a result of the record in the LNP proceeding, the Commission directed NANC to report on “how to implement number portability in a roaming environment.”¹⁶ The “resolution of nation wide roaming,” however, is listed as an “open issue” in the NANC report.¹⁷ The NANC Report contains no final specifications for MIN/MDN separation, does not address any alternatives to MIN/MDN separation, and contains no timetable to develop the necessary specifications. The June 30, 1999 WNP implementation deadline is less than eleven months away, and there is no indication that NANC will, in fact, carry out in any meaningful way the Commission’s mandate to describe to wireless carriers “how to implement number portability in a roaming environment.” The Commission should therefore direct the NANC, as its first priority, to make a concerted effort to achieve industry-developed consensus technical

1997). Characterization of the record is taken from Telephone Number Portability, *CTIA Petition for Forbearance*, Comments of Bell Atlantic Mobile, Inc. at 18 (February 23, 1998).

¹⁴ CTIA Report on Wireless Number Portability, Version 2.0 (July 7, 1998) at pp. 26, 63-65 (CTIA Report). Currently the MIN and MDN are the same ten-digit value. When end users port from a wireless carrier, they port their MDN (telephone number) to the new carrier. The MIN remains with the old carrier and will be reassigned, as a MIN, to a subsequent customer. Thus, a single ten-digit value has the potential to be a MIN for one customer in a given network and an MDN for a second customer in another network. The MIN and the MDN may continue to be the same value for end users that have not ported.

¹⁵ NANC Report at § 7.2.2.

¹⁶ *Second Report and Order* at 12334.

¹⁷ NANC Report at § 7.2.2.

specifications that will in fact allow all wireless carriers to implement WNP in a nation-wide roaming environment. It should allow NANC sufficient time to ensure that such specifications are developed in an environment characterized by consensus and procedural regularity. These specifications would then be redirected to appropriate standards bodies to convert the specification into technical standards that will allow all wireless carriers to implement WNP in a nationwide roaming environment. The Commission must allow NANC and the appropriate standards setting bodies sufficient time to complete their work prior to WNP implementation.

B. The Commission Should Resolve the Industry Impasse Over Technologically Neutral Intermodal Number Portability.

The Commission directed NANC to consider other issues of concern to wireless carriers such as “how to account for differences between service area boundaries for wireline versus wireless services.”¹⁸ This issue is tersely described in the NANC Report as the “Rate Center Issue.”¹⁹ The report adequately describes the technical problems posed by the differences between service area boundaries for wireless and wireline carriers. It further describes the inability of the WWITF or the NANC to resolve whether the current wireline/wireless architecture disparity results in a lack of competitive parity. Because this impasse impeded the rapid development of WNP guidance, the WWITF wisely escalated the issue to NANC, which, in turn, wisely escalated the issue to the Commission.²⁰

¹⁸ *Second Report and Order* at 12334.

¹⁹ NANC Report at § 3.1.1.

²⁰ Letter from Alan C. Hasselwander, Chairman, North American Numbering Council to A. Richard Metzger, Jr., Chief, Common Carrier Bureau, FCC (March 12, 1998).

The Commission thus has pending before it two separate requests from NANC seeking firm regulatory guidance on the meaning of “technology neutral” in the context of two important network architecture changes relating to the North American Numbering Plan, intermodal number portability and number pooling. Before meaningful standards and specifications for WNP can be developed or implemented, the Commission must provide the clarification previously requested by NANC. The Commission should immediately initiate a public comment cycle on these issues. Until these critical policy issues are resolved, WNP implementation cannot proceed.

C. The NANC Should Reexamine the Basis for its Proposal to Study Replacing the LSR Process and for Shortening Porting Intervals.

With its most important task of solving the roaming problem yet unresolved, the NANC has apparently decided to spend the next six months studying whether to fix processes that are not broken. The Local Service Request (LSR) is a communications process by which donor and recipient service providers coordinate subscriber porting. It is the process used in porting wireline numbers. NANC recommends studying whether to replace this process for wireless to wireless ports.²¹ However, wireless carriers will still have to implement the current LSR process to port to or from wireline carriers. Further, wireless carriers will have to use the existing LSR process, at least initially, prior to implementing any replacement process. Unnecessary complexity is thus being introduced into the process by suggesting that carriers employ two different communications processes. The NANC has provided no reason why industry resources should be expended on this project when much more important issues remain to be resolved.

²¹ NANC Report at § 7.1.1.

Similarly, the NANC is studying the need to reduce porting intervals for wireless to wireless ports, and whether this should be accomplished by changes to the current Number Portability Administration Center (NPAC) “timers.”²² The current NPAC, however, supports the desired reduced porting intervals as long as both carriers agree to the port. In the event of a disagreement, the number will not immediately port until the disagreement is resolved. In the event one carrier does not cooperate, a change to the NPAC timers pursuant to the NANC Report will not result in number porting immediately.

Reducing porting intervals through timer modification is not as simple as changing an NPAC timer value. Rather, procedures must be redefined, including the current role of the LSR process in porting and in conflict resolution. Further, modifying the NPAC in this manner may lead to additional problems, including adding unnecessary changes and complications to the NPAC, requiring modifications to LNP operational support systems, complicating porting business procedures, increasing system costs, and exacerbating any legitimate anomalies that may occur in the porting process. This work would appear to be another misguided priority. The industry’s resources are better spent in solving the nationwide roaming problem.

D. Other Considerations that Effect WNP.

The NANC Report candidly acknowledges that the effects of the report on resellers were not considered.²³ A significant number of wireless users are customers of resellers of CMRS. To date, there has been minimal reseller participation in number portability working groups.

²² NANC Report at § 7.1.2, *Public Notice* at 2.

²³ NANC Report at § 7.2.1.

Therefore, it is incumbent upon NANC to consider the effects of any requirements it adopts on resellers.

II. THE NANC REPORT IS PROCEDURALLY DEFICIENT

Technical standards should be developed by the industry itself through the consensus process. Current industry fora operate under well-established procedural rules and generally accepted definitions of key terms such as “quorum,” “consensus” and “agreement”. The Commission should instruct NANC not to modify the products of its working groups directly.

A. NANC Should Not Modify the Product of its Working Groups Directly.

The NANC Report states that the WWITF “is opened [sic] to all parties and is representative of all segments of the telecommunications industry.”²⁴ BellSouth, which is not a member of NANC, participated actively in the WWITF and in the development of the May 8 Report. The May 8 Report as submitted by the WWITF to NANC recommended that wireline carriers review the time intervals required for porting, and contained a detailed plan and associated timeframes for conducting this analysis. NANC, without concurrence by the WWITF, removed this information from the May 8 report and changed the completion date of the analysis.

When NANC submitted the WWITF Report to the Commission, it did not advise the Commission that it had either deleted the original analysis plan or modified the original completion dates recommended by the WWITF. BellSouth submitted a minority opinion in which it stated that industry and workgroup reports submitted to NANC should not be modified in any fashion because such reports are the collective effort of many parties, some of whom do

²⁴ NANC Report at 6, § 2.3.

not have membership on NANC. BellSouth stated that if the NANC does not agree with or endorse such reports, it should either return the report to the working group for reconsideration, or submit the report unaltered and, under a separate attachment, summarize NANC's concern or disagreement with the report.

B. The Commission Should Clarify the Procedural Rules Applicable to NANC and its Working Groups.

The sequence of events that resulted in a NANC Report that is both procedurally and substantively flawed demonstrate that NANC should not be used by the Commission or any other party as a way to *promulgate technical industry standards* more rapidly than existing processes allow.²⁵ While industry fora such as T1, the INC and other entities are criticized by some in the industry on the grounds that they work slowly, these groups have well defined processes and procedures, including accepted definitions of "consensus". Although NANC recently adopted a set of operating principles, NANC has no definition of "consensus" and its subtask groups vary widely in the way they conduct and attend meetings, and vote. These groups operate under no clear principles on what constitutes a "quorum", a "consensus", an "agreement", or what it takes to change a recommendation.

NANC, on at least two occasions, has either vetoed major working group recommendations, or unilaterally altered and revised working group reports. Certainly, NANC has the authority to do so. However, the NANC and the Commission must realize that working group recommendations and working group reports are the collective effort of many parties,

²⁵ While BellSouth is constrained to comment on the NANC Report's deficiencies, BellSouth believes that nine months was simply an unreasonable time to expect NANC to accomplish all that was asked of it by the Commission, especially given its other work.

some who do not have membership on NANC and by many who are willing to compromise their original positions. NANC should never change reports of its working groups and present the report as that of the working group. In addition, any NANC veto of a working group recommendation should be fully explained and documented. BellSouth recommends that the Commission insist on strict procedural regularity with respect to NANC and its subtask work groups.

III. THE WIRELESS INDUSTRY IS FAR FROM READY TO IMPLEMENT WNP

Both the CTIA and NANC Reports show that there is no simple solution to the problems posed by implementing WNP while preserving nationwide roaming. As shown above, the wireless industry is now in the untenable position of having to respond to a Commission mandate to implement WNP in less than a year without technical standards. The Commission should, therefore immediately grant the pending CTIA petition for waiver of the WNP implementation requirements.

In the meantime, the complexity of the remaining issues to be resolved in implementing WNP demand that the Commission ensure that there be current and future integration of industry efforts to develop technical standards. Although charged to monitor industry efforts, the NANC Report does not take into full account all of the work done by CTIA, T1 or other appropriate standards bodies. The Commission should direct NANC to take into consideration the CTIA Report as well as the work of appropriate standards setting bodies.

Information and timelines provided in the CTIA Report, and ex partes by wireless carriers, demonstrate that, despite ongoing diligence, WNP will not be technically feasible until late 2000. This feasibility date represents the earliest availability of modifications needed for

WNP. It does not accommodate any changes necessitated by wireless-wireline integration efforts nor any delays due to the substantive deficiencies of the NANC report.

The Commission should also provide the industry immediate guidance in response to NANC's request for assistance in defining "technology neutral," resolving the rate center issue, and clarifying the role of wireless carriers outside the top 100 MSAs, in the implementation of LNP. Such guidance is imperative for the industry to correctly develop the necessary modifications for WNP.

IV. CONCLUSION

The Commission should recognize that WNP cannot be implemented by the current deadline. It should act immediately to consider the CTIA petitions and eliminate the current deadline for implementing WNP.

The Commission should determine that the NANC Report does not comply with the substantive requirements of the *Second Report and Order*. The Commission should reject the May 18 recommendation. The Commission should direct NANC to reset its priorities by addressing the roaming issue before addressing less critical NPAC operational issues. The Commission should require NANC's Final Report to address progress made in developing technical specifications to implement WNP in a roaming environment, the impact of NANC's WNP recommendations on resellers, and to coordinate and integrate the related work of CTIA,

T1 and other industry fora. The Commission should require NANC and its subtask groups to operate fairly, openly, and pursuant to well-defined procedural safeguards.

Respectfully submitted,

BELLSOUTH CORPORATION

By its Attorneys:

A handwritten signature in dark ink, appearing to read "M. Robert Sutherland", is written over a horizontal line.

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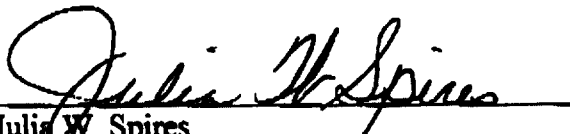
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I hereby certify that I have this 10th day of August 1998, serviced all parties to this action with the foregoing COMMENTS, reference docket CC 95-116, NSD File No. L-98-94, by hand service or by placing a true and correct copy of the same in the United States Mail, postage prepaid, addressed to the parties as set forth on the attached service list.


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